

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
_____)	Re: Docket No. 15110

**MOTION FOR EXPEDITED CONSIDERATION AND TO SHORTEN NOTICE
ANDERSON MEMORIAL HOSPITAL AND THE SPEIGHTS & RUNYAN
CANADIAN CLAIMANTS' MOTION TO STRIKE THE SUPPLEMENTAL
DECLARATION OF GRAEME MEW OR IN THE ALTERNATIVE, TO
REQUIRE FURTHER EXAMINATION AND FURTHER RELIEF**

Pursuant to L.B.R. 9006-1(e), the above-referenced ("Movants") submit this Motion for Expedited Consideration and to Shorten Notice (the "Motion to Expedite") the above-referenced motion to strike (the "Motion to Strike").¹

1. The Motion to Expedite requests this Court to expedite consideration of Movants' Motion to Strike, in which Movants request that the Supplemental Declaration of Graeme Mew filed by the Debtors on March 23, 2007 be stricken, or for alternative relief as set forth in the Motion to Strike.

2. Due to the fact that the pending motions for summary judgment are being argued before the Court on Monday, April 9, 2007, and because the Mew declaration was filed in support of the Debtors' motions for summary judgment, Movants respectfully request that the Motion to Strike be heard at the April 9, 2007 hearing with objections to be considered at the hearing.

¹ Movants are aware that L.B.R. 9006-1(b) requires that discovery-related motions need only be filed five (5) days before the hearing date. However, in light of the Court's "Order Scheduling Omnibus Hearing Dates for 2006," docket # 9704, which provides that motions for the January 22, 2007 hearing must be filed by December 18, 2006, Movants believe that the filing of this motion to expedite is proper.

3. Moreover, the Motion to Strike does not present any complex questions of facts or law and could be considered on a summary basis.

WHEREFORE, for all these reasons, Movants request that the Court enter an Order substantially in the form attached shortening notice of the Motion to Strike and scheduling a hearing on such motion on an expedited basis.

DATED: April 6, 2007

/s/ Christopher D. Loizides

Christopher D. Loizides (No. 3968)

LOIZIDES, P.A.

1225 King Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 654-0248

Facsimile: (302) 654-0728

E-mail: loizides@loizides.com

-and-

Anne McGinness Kears

MOTLEY RICE LLC

28 Bridgeside Blvd.

P.O. Box 1792

Mt. Pleasant, SC 29465

Telephone: (843) 216-9000

Facsimile: (843) 216-9540

Daniel A. Speights (SC Fed. ID No. 4252)

C. Alan Runyan (SC Fed ID No. 4837)

Marion C. Fairey, Jr. (SC Fed ID No. 6101)

SPEIGHTS & RUNYAN

200 Jackson Avenue, East

P.O. Box 685

Hampton, SC 29924

Telephone: (803) 943-4444

Facsimile: (803) 943-4599